

# LAW OFFICES OF VADIM A. GLOZMAN

*Attorneys and Counselors at Law*

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August 18, 2021

## VIA ECF

The Honorable Alison J. Nathan  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Yury Mosha, 21 CR 92 (AJN)

Dear Judge Nathan,

Mr. Mosha is currently released on the following agreed-upon conditions:

- a \$300,000 personal recognizance bond cosigned by four (4) financially responsible persons;
- travel restricted to SDNY/EDNY;
- surrender travel documents and no new applications;
- supervision as directed by Pretrial Services; and,
- home incarceration with GPS monitoring.

In April of this year, this Court granted Mr. Mosha movement, Monday through Friday at 8:00am until 9:30am and then again from 5:00pm until 6:30pm, to allow him to pick up and drop off his daughters at day care. Mr. Mosha has had no violations or alleged violations of his pretrial release. He has been fully compliant.

Mr. Mosha respectfully moves this Court to modify his conditions of release to allow him to be placed on a curfew, with all other conditions to remain the same.

The undersigned has spoken to both Assistant United States Attorney Jonathan Rebold and Pretrial Services Officer Francesca Piperato, neither of whom have an objection to the instant request. Pretrial Services Officer Piperato requested

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that the language of the Order state that Mr. Mosha be placed on curfew with GPS monitoring, the hours of which are to be set at the discretion of Pretrial Services.

Thank you for your consideration.

Respectfully submitted,

*Vadim A. Glozman*

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cc: Assistant U.S. Attorney Jonathan Rebold (via ECF)  
Assistant U.S. Attorney David Felton (via ECF)  
Pretrial Services Officer Francesca Piperato (via email)